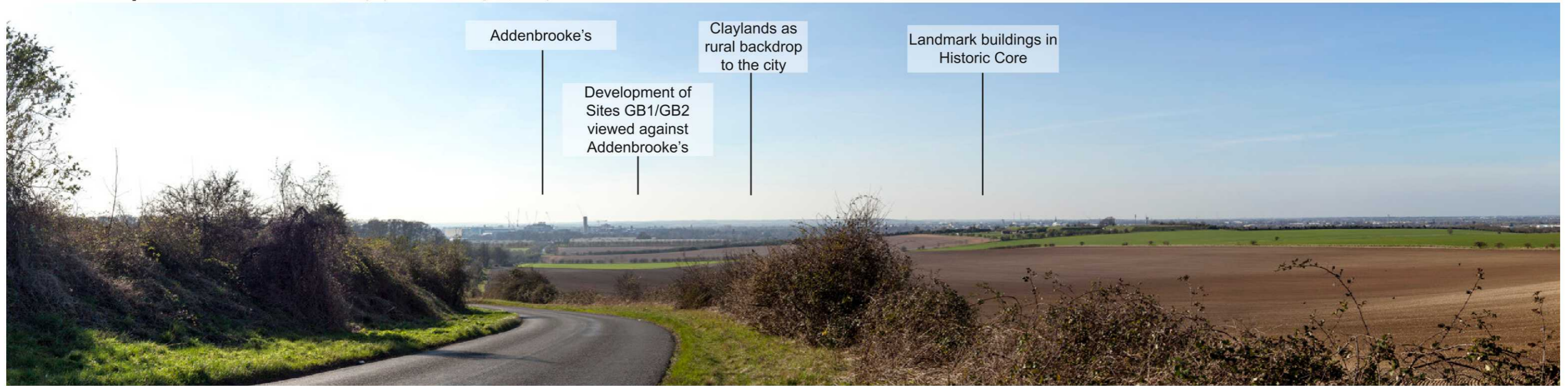
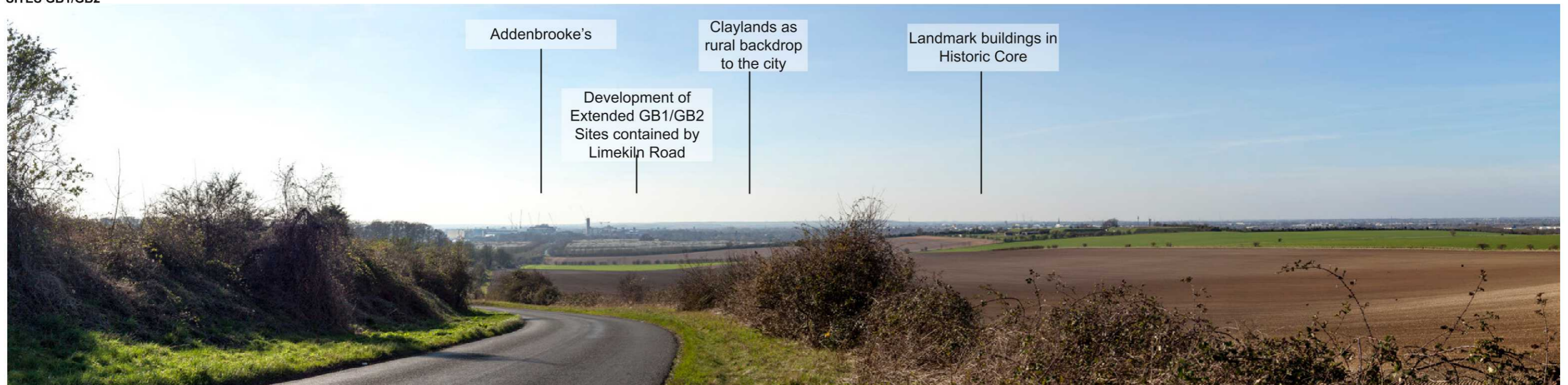


Photoviewpoint 1: Worts Causeway (LDA Photograph 7)



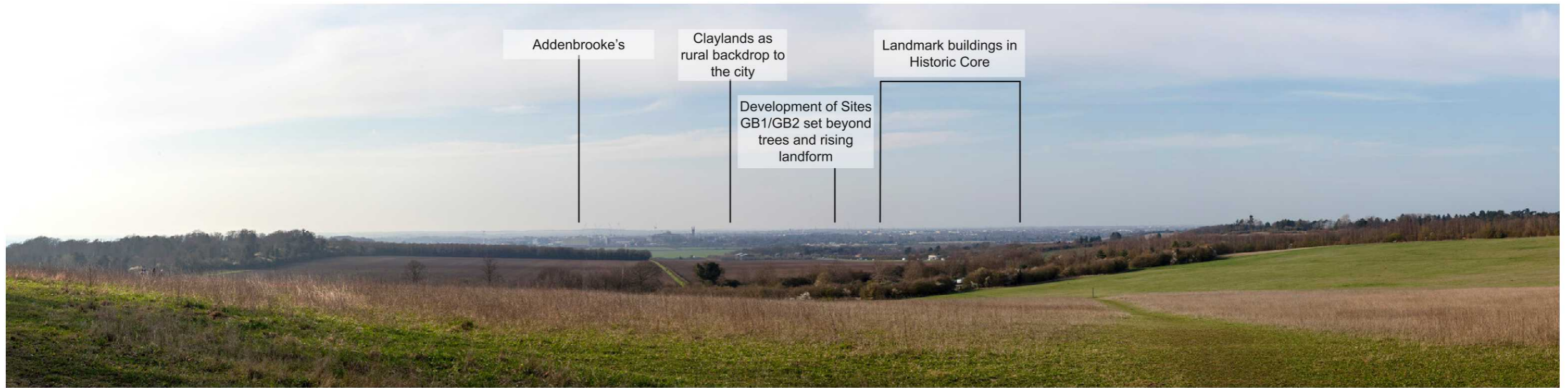
SITES GB1/GB2



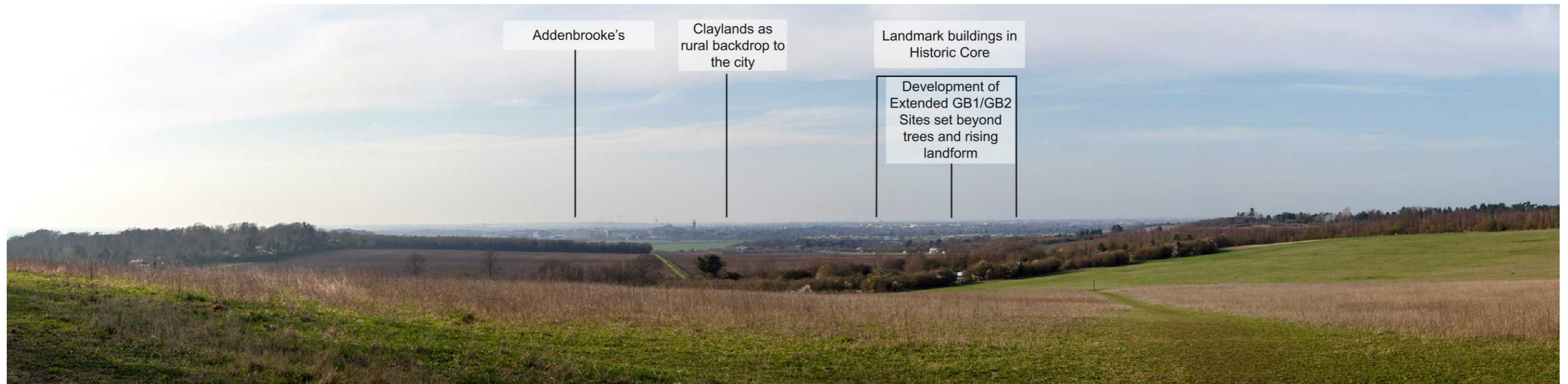
SITES EXTENDED GB1/GB2

Difference	Tyler Grange Assessment
<p>As illustrated by the comparative wirelines and photomontages for Photoviewpoint 1, there is a limited difference between Sites GB1/2 and Extended GB1/2 in elevated views from Wort's Causeway to the east.</p> <p>Both options limit development to an area of land beyond the rising land of Limekiln Hill and the boundary between the open arable landscape of the chalkland ridge in the foreground formed by Limekiln road and associated trees and hedgerows.</p> <p>The composition of the view remains largely unaltered, with the balance of elements and features within it remaining, including the Claylands as a backdrop beyond the city and views over Limekiln Hill towards the historic core and landmarks on the skyline.</p>	<p>Development of the Extended GB1/2 sites complies with the LDA criteria parameters by respecting the composition of the view, including:</p> <ul style="list-style-type: none"> • Retaining the distinct character of the agricultural fieldscape on the rolling chalkland ridge in the foreground; • Ensuring development does not extend onto the slopes of Limekiln Hill; • Retaining uninterrupted views towards the historic core beyond Limekiln Hill; and • Retaining the backdrop of the Claylands beyond the city; <p>As illustrated by the photomontages, both options allow for the provision of an improved soft green edge to the city by employing landscape buffer planting.</p>

Photoviewpoint 2: Magog Down (LDA Photograph 7)



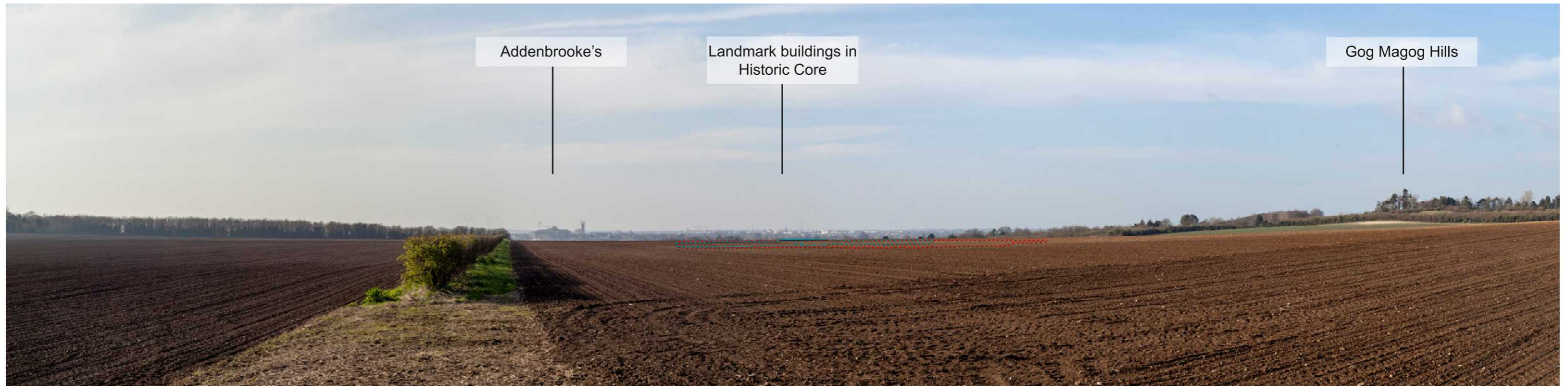
SITES GB1/GB2



SITES EXTENDED GB1/GB2

Difference	Tyler Grange Assessment
<p>As illustrated by the comparative wirelines and photomontages for Photoviewpoint 2, there is a limited difference between Sites GB1/2 and Extended GB1/2 in elevated views from Magog Down.</p> <p>Both options limit development to an area of land that is well contained by the rising land of Limekiln Hill and trees and woodland.</p> <p>The composition of the view remains largely unaltered, with the balance of elements and features within it remaining, including the Claylands as a backdrop beyond the city and views over Cambridge towards the historic core and landmarks on the skyline.</p>	<p>Development of the Extended GB1/2 sites complies with the LDA criteria parameters by respecting the composition of the view, including:</p> <ul style="list-style-type: none"> • Retaining the landform, character and composition of views across Magog Down and the wider arable landscape; • Ensuring development does not extend onto the slopes of Limekiln Hill; • Retaining uninterrupted views towards the historic core beyond Cambridge; and • Retaining the backdrop of the Claylands beyond the city;

Photoviewpoint 3 : Haverhill Road, west of Magog Down



— Sites GB1/2 situated below ridge in the foreground

- - Extended GB1/2 Sites situated below ridge in the foreground

Difference	Tyler Grange Assessment
Neither of the options would impact on views from this location.	Development of the Extended GB1/2 Sites would comply with the LDA criteria and parameters through limiting the extent of development to retain the composition of views from this location, including the skyline and landmarks within the historic core.

Photoviewpoint 4 : Hinton Way, north of Great Shelford



SITES GB1/GB2



SITES EXTENDED GB1/GB2

Difference	Tyler Grange Assessment
<p>Due to the limited nature of views across land at GB1/2 to the southeast of Cambridge, there would be no appreciable difference between the development of Sites GB1/2 and Extended GB1/2.</p> <p>This is illustrated by the comparative photomontages of the two masterplan options for Photoviewpoint 4</p>	<p>Development of the Extended GB1/2 sites would comply with the LDA criteria and parameters, retaining the composition of views and views towards the city skyline.</p>

Key Point 3:

Development of the Extended GB1 and GB2 Sites would be contained within existing urban gateways on the approach to Cambridge

LDA Criteria 3 - Short and / or characteristic approaches to the historic core from the edge of the city

Assessment Criteria / Importance of this Sector to Green Belt Purposes.	Implications of Green Belt Release for Development.	Parameters for Green Belt Release.
<p>The south eastern approach to Cambridge along Babraham Road, on the southwestern boundary of the sector, is a historic route that passes over the Gog Magog Hills.</p> <p>The first view of the city is an elevated panoramic view from the top of the hill near the Haverhill Road junction., southeast of this sector.</p> <p>The urban gateway is marked by suburban housing and Addenbrooke's Hospital at the northern corner of the sector.</p> <p>The sector makes a significant contribution to the rural character of these approaches to the city edge but does not contribute to the approaches from the city edge to the historic core.</p>	<p>The new Green Belt boundary would be no further from the Historic Core than existing boundaries to the east at Cherry Hinton.</p>	<p>LDA Parameters for Sector 11.1 (GB1) The boundary of land released in this location should correspond with the edge of any release in sub area 11.2, to create a clear urban gateway on Wort's Causeway.</p> <p>LDA Parameter for Sector 11.2 (GB2) Land along the western edge of sub area 11.2 could be released for development. However, a substantial buffer should be retained as Green Belt to retain clear separation between the new urban gateway and the Park & Ride site, and the boundary of the released land should tie in with the new urban gateway along Wort's Causeway</p>

Tyler Grange Analysis

Critique of Approach

- It is unclear as to why there is a need to retain separation between the Park and Ride site and any "new" urban gateway. The parameters do not identify what is meant as a "substantial buffer" and what is meant by "clear separation".
- LDA do not provide any objective measures against which to assess or define the location of a new urban gateway on Babraham Road, which the 2015 Study identifies as a main route into Cambridge.
- The parameters consider that the creation of a further "clear urban gateway" on Wort's Causeway should correspond with that on Babraham Road.
- LDA identify urban fringe development to the east of Cambridge on Newmarket Road (A1303) as forming an urban gateway [CEG matters Statement to Matter PM2 - Green Belt Review Methodology, Issue PM2.1 (report ref 1665-R12c), Appendix4: Cambridge Park and Ride Sites and Urban Gateways].
- The 2015 Study does not provide any analysis to back up or justify the parameters. Furthermore, the parameters are not identified by a definitive line on the ground and are therefore open to interpretation. This highlights the fact that there is no clear rationale behind the location of new gateways within the extents of existing urban fringe development and road junction on the approaches to the city.

Measure

- The LDA parameters are not defined as a line on a drawing and therefore cannot be measured.
- The proposed allocations at Sites GB1 and GB2 provide an outer extent of development from which to measure the length of the main route along Babraham, Road / Hills Road to the edge of the historic core (distinctive Cambridge).
- Difference between distance of Sites GB1 /2 and Extended GB1/2 from historic core along this main route / approach.

Comparative Assessment

Performance of GB1 / GB2
<p>The development of GB2 would result in an increase in the length of the green / treed approach of 410m¹ resulting in the overall length of the approach being 3.87km to the historic core.</p> <p>The release of Site GB1 would not extend development along the main approach of Babraham Road.</p> <p>¹ (as measured from LDA's urban gateway at the suburban housing west of the Grantham's Road junction to the eastern edge of site GB2).</p>
Performance of Extended GB1 / GB2
<p>The development of the Extended GB2 Site would result in an increase in the length of the green / treed approach of 540m resulting in the overall length of the approach being 4km to the historic core.</p> <p>The release of the Extended GB1 Site would not extend development along the main approach of Babraham Road.</p>
Difference
<p>The difference between Site GB2 and the Extended GB2 would be an increase of an additional 130m of a green / treed approach.</p> <p>This would equate to a 3.4% increase above what the Councils consider acceptable.</p> <p>Development of the Extended Site GB2 would be situated entirely within the extents of existing urban fringe development at the gateway to Cambridge approaching the city along Babraham Road (park and ride, car dealership, houses, business units and school).</p> <p>The LDA parameters would suggest that a greater extent of development than that shown by sites GB1 and GB2 is acceptable.</p> <p>The plan overleaf demonstrates how the above relates to the overall scale of the approaches along Babraham Road and Wort's Causeway.</p>

Summary

- The comparative assessment has identified that the difference in the length of the green / treed approach from the edge of the city to the historic core along Babraham Road / Hills Road between Site GB2 and Extended GB2 would only be **3.4% (130m)**.
- The LDA parameters do not show a line on the ground. It is therefore unclear as to the extent of development that LDA consider acceptable.
- Development of the whole of Sector 11 would fall within the extents of existing urban fringe development on Babraham Road that forms a gateway on the approach to Cambridge. Development includes the park and ride, car dealership, houses, business units and school.
- As illustrated by the "first view of Cambridge" at the junction with Haverhill Road, there would be no discernible difference between the Council's proposed allocation sites, LDA parameters or the Omissions Sites.
- Photoviewpoint 5 illustrates view approaching on Babraham Road adjacent to the car dealership, demonstrating the urbanising influence of existing urban fringe development to the southeast of Sector 11.
- The Comparative Photomontages for Photoviewpoint 5 demonstrate the limited difference between either of the development options (Sites GB1/2 and Extended GB1/2).

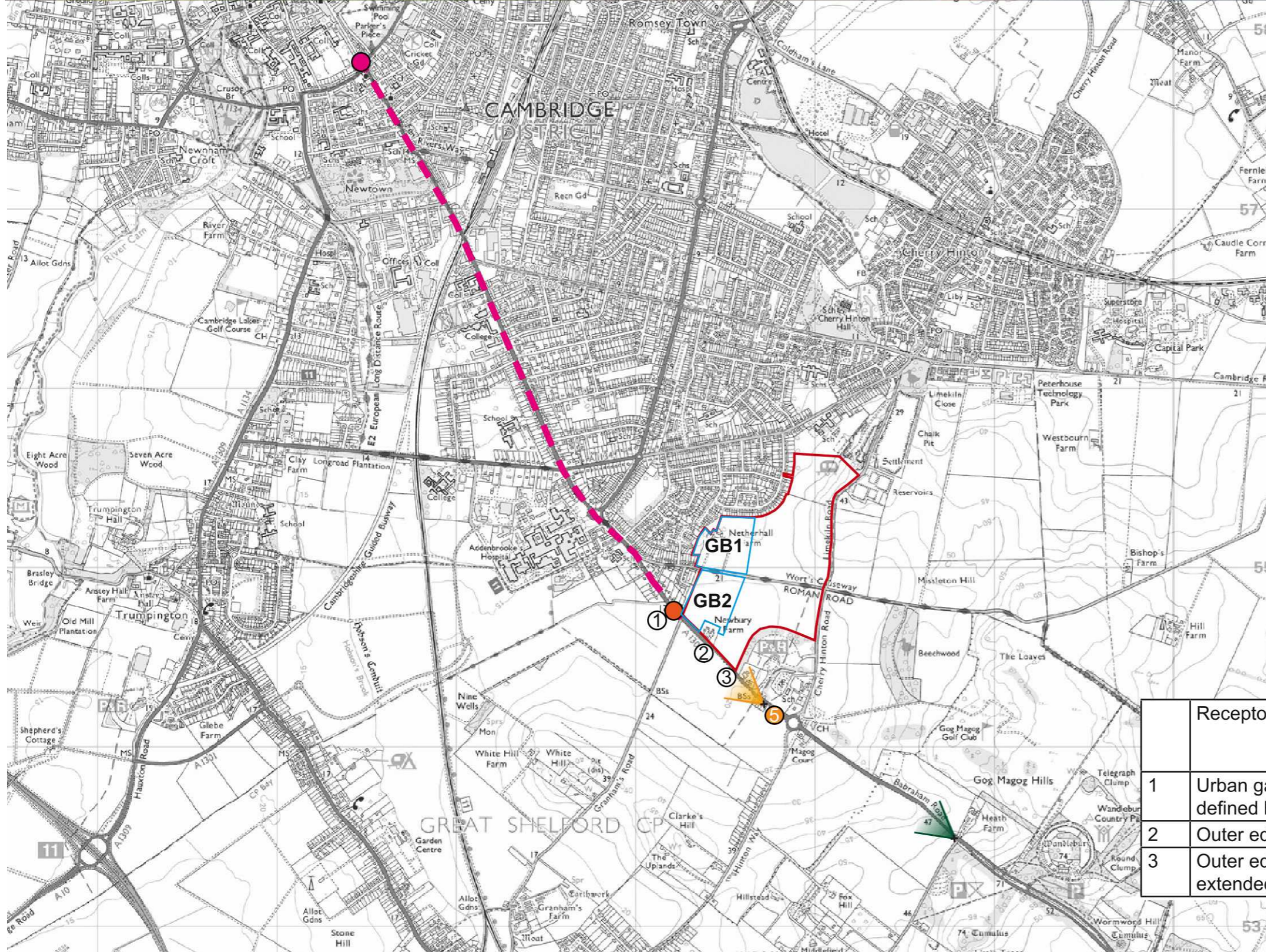
First View of Cambridge from Babraham Road

Land at Southeast Cambridge situated beyond intervening trees



Analysis of Approach along Hills Road

- Site GB1 and GB2
- Extended GB1 and GB2
- ▶ View of from Babraham Road (Park and Ride)
- ▶ First View of Cambridge from Babraham Road
- Urban Gateway
- Gateway to Distinctive Cambridge
- Hills Road Approach



	Receptor	Total Distance from Gateway to Distinctive Cambridge	Cumulative distance
1	Urban gateway as defined by LDA	3.46Km	
2	Outer edge of GB2	3.87Km	+ 410m
3	Outer edge of extended GB2	4.00Km	+ 540m

Photoviewpoint 5: Babraham Road (Park and Ride)



SITES GB1/GB2



SITES EXTENDED GB1/GB2

Key Point 4:

Extended Sites GB1 and GB2 are defined by existing permanent boundaries which may be strengthened through their release from the Green Belt.

Use of Defensible Boundaries for Green Belt Release

11. As set-out within the various Representations, Matters Statements and Hearing appearances made on behalf of CEG (as summarised at Section 1), the 2015 Study has been found to be flawed in its methodology and approach. The Study therefore provides an unsound evidence base for the identification and justification of proposed allocation sites at southeast Cambridge that do not reflect the Green Belt constraints and boundaries on-the-ground.
12. These matters were addressed in previous representations made by CEG, including the identification of the following key issues:
 - The introduction of criteria which are not relevant to the Green Belt purposes and therefore not consistent with National Policy;
 - Reliance on subjective measures and general narrative to describe performance against the criteria and definitions of the extent of potential release sites, meaning that the conclusions are open to interpretation and cannot be replicated or verified;
 - The baseline studies and analysis place an emphasis on issues relating to the character and setting of Cambridge, which has filtered down to the assessment criteria and resulted in an over-emphasis on the importance of setting in balance against the overall assessment of the Green Belt; and
 - The Study does not provide a clear explanation or justification of how land within those sectors and sub areas assessed contributes to the Green Belt and does not allow for the clear identification of areas of land that are suitable for release from the Green Belt.
13. In the case of Sites GB1 and GB2, the LDA parameters defined by the 2015 Study and the 2016 Supplement have led to the identification of small parcels of land with arbitrary boundaries which are justified by a set of undefined and inappropriate parameters.
14. LDA's parameters for the release of Green Belt land at Sector 11 do not provide flexibility or consider opportunities for the release of land within the area that is defined by existing permanent, robust and recognisable boundaries formed by the roads and associated trees and hedgerows that bound sub area 11.1 (Extended Site GB1) and sub area 11.2 (Extended Site GB2). This approach serves to unnecessarily limit the extent of land to be released at Sites GB1 and GB2.

Requirements of the NPPF

15. At paragraph 85, the NPPF states that when drawing up or reviewing the Green Belt and defining boundaries, local planning authorities should:
 - "Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period" (fifth bullet point); and
 - "Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent." (sixth bullet point)
16. The LDA parameters do not allow for the release of land up to existing defined boundaries. The 2015 Study does not provide a plan that identifies the extent of the new proposed boundary.
17. This is contrary to the last bullet point in NPPF paragraph 85. This requires LPAs to recognise the desirability of utilising existing boundaries where they exist. That does not mean that a Green Belt boundary cannot be defined unless an existing boundary exists; but where such a boundary does exist then careful consideration should be given to utilising such a boundary.
18. The extent of the proposed allocations as Sites GB1 and GB2 is of a smaller extent than that suggested by the LDA parameters. This demonstrates the limitations and flaws with LDA's methodology and its application, as well as the arbitrary nature of the boundary being put forward by the Council.

Recommendations for Defining a New Green Belt Boundary at Southeast Cambridge

19. The release of Green Belt land proposed by CEG for Extended GB1/2 (ref. CCSC1005a) extends to include an area of land bounded by Limekiln Road and Cherry Hinton Road to the east. This recognises the presence of existing strong and defensible, permanent boundaries along the roads as forming an appropriate new Green Belt boundary.
20. There should be flexibility at the development control and design stages to ensure that development respects non-Green Belt sensitivities, including landscape character, biodiversity / conservation interests, etc. This may be enforced through SPD and appropriate policies. This would allow for the development of land within the area released to be controlled so as to respect other non-Green Belt sensitivities.
21. This is reflected in the approach taken by the Illustrative Masterplan¹ for the Extended Sites GB1 and GB2 that interprets LDA's narrative when describing the parameters whilst retaining the sloping land at Limekiln Hill as undeveloped and allowing for the development to respond to the sensitivities of the site, whilst retaining strong, defensible Green Belt boundaries along the existing roads that define the land parcels, this is illustrated on the CGI overleaf.
22. In the 2015 Study, LDA provide no explanation as to why it is necessary to retain a greater area of land to the west of Limekiln Hill and Cherry Hinton Road as permanently open. It is unclear what purpose this additional area of land serves, especially given that there is a long standing and much more obvious boundary immediately to the east formed by Limekiln Road and Cherry Hinton Road.
23. In addition to not according with the final (sixth) bullet point of NPPF paragraph 85, the drawing of arbitrary new Green Belt boundaries in this location would not serve to meet the NPPF policy requirement that LPAs should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. The land left over to the east of the proposed Site GB1 and GB2 allocations and revised Green Belt boundary will invite future planning applications, and it is therefore contrary to advice in the penultimate bullet of paragraph 85 of the NPPF.
24. The need to define clear boundaries using existing features on the ground is further strengthened by the analysis and critique contained within previous representations that has found the methodology and recommendations for the release of land at Sites GB1 and GB2 be flawed. The 2015 Study relies on narrative that is open to interpretation, resulting in the LDA parameter suggesting a greater area of land to be released than that allocated for Sites GB1 and GB2, based on a narrative and no clear line on a plan.
25. The assessment has demonstrated that, even if LDA's criteria are assessed using objective and measurable parameters, the release of the Extended GB1 and GB2 sites would have no substantially greater material effect on the function and purposes of the Cambridge Green Belt than the Council's proposed allocations at Sites GB1 and GB2.

¹ CEG Representations to proposed Modifications January 2016 - Appendix 7 - Development Prospectus



Ref: Appendix 5 to CEG's Matters Statement PM2-17653

Conclusions

26. As set-out in the representations, matters statements and local plan hearings presented to the Local Plan, the detailed analysis of LDA's Green Belt Criteria and Parameters has demonstrated that the 2015 Study is flawed in its approach to identifying land that may be released from the Green Belt.
27. Tyler Grange have undertaken a comparative assessment of the proposed GB1 and GB2 allocation sites against CEG's Extended GB1 and GB2 Sites to demonstrate that, even if the 2015 Study were to be retained as the evidence base to support the release of Green Belt and allocation of sites:
 - *Extended GB1/2 allocation can be justified through analysis of the LDA criteria (Green Belt Qualities) using measurable and objective thresholds as opposed to subjective and narrative based assessment; and*
 - *The greater release of land as proposed for the Extended GB1/2 Sites for circa 1,260 dwellings would be acceptable in Green Belt terms and would not result in a greater level of harm to the Green Belt than the proposed Local Plan allocations at GB2 and GB2.*
28. The assessment demonstrates that, even if LDA's criteria are assessed using objective and measurable parameters, the release of the Extended GB1 and GB2 sites would have no greater material effect on the function and purposes of the Cambridge Green Belt than the Council's proposed allocations at Sites GB1 and GB2.
29. The release of Green Belt land proposed by CEG for Extended GB1/2 (ref. CCSC1005a) recognises the presence of existing strong and defensible, permanent boundaries along the roads as forming an appropriate new Green Belt Boundary.
30. Release of the Green Belt to include land bound by Limekiln Road and Cherry Hinton Road would accord with the requirements of the NPPF at paragraph 85 regarding the need for new Green Belt boundaries to endure beyond the plan period and be defined clearly, using physical features.

Annex 4 – Plan showing the location and estimated delivery timetable of infrastructure funded through City Deal in the context of the Extended GB1/GB2 allocation